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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**WEBSITE MANAGEMENT SYSTEMS,
LLC, a Nevada Limited Liability
Company**

Case No.: 2:20-cv-00213

Plaintiff

V.

BENJAMIN DAILEDA, an individual residing in Nevada, MELVIN OMAN, an individual residing in Nevada, DEVAN HIRST, an individual residing in Nevada, YES WE WILL, INC., a Nevada Corporation, and DOES 1-X

Defendants

**DECLARATION OF ROBERT LISI IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

DECLARATION

I, Robert Lisi, declare as follows:

1. I am a Sales Manager/Closer/Trainer for Website Management Systems, LLC (“WMS”). I was hired by WMS on November 11, 2016.

2. On January 24, 2020, I contacted a lead named Katrina Creedon who was generated by our lead generation team.

3. When I reached Ms. Creedon by telephone, she advised me that she had already been contacted by 1st Page Group to provide the search engine optimization services and had signed a contract with them. She also advised me that 1st Page Group's sales pitch, pitch materials, including website demo, search engine optimization process and fulfillment process

1 were the same as those of WMS.

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3 I declare under penalty of perjury pursuant to the laws of the United States of America that
4 the foregoing is true and correct.

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6 Dated: March 2, 2020



7 ROBERTLISI

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